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Honorable James L. Robart

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

LISA BROWNE, et al.,

Plaintiffs,

v.

SANOFI-AVENTIS U.S. LLC and SANOFI US SERVICES INC. formerly known as SANOFI-AVENTIS U.S. INC.,

Defendants.

Case No. 2:23-cv-01643-JLR

STIPULATED NOTICE OF PENDING SETTLEMENT AND MOTION TO STAY PROCEEDINGS

NOTE ON MOTION CALENDAR:

## NOTICE OF PENDING SETTLEMENT AND MOTION TO STAY PROCEEDINGS

Plaintiffs Lisa Browne and Keith Browne and Defendants Sanofi U.S. Services Inc. and Sanofi-Aventis U.S. LLC (collectively, "the Parties"), hereby give notice that the Parties have reached an agreement in principle for the complete resolution of this matter.

The Parties are in the process of preparing and finalizing a Master Settlement Agreement, which will include the instant case, as well as other cases in multi-district litigation. Accordingly, the Parties in this matter respectfully request that this Court vacate all pending deadlines and stay this matter for six months, through and including May 24, 2024, at which time a status report informing this Court of the settlement status or a motion for appropriate relief shall be due.

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Shook, Hardy& Bacon L.L.P. 701 5<sup>th</sup> Avenue, Suite 6800 Seattle, WA 98104-7066 206.344.7600

1	Dated: December 27, 2023	
2		
3	By: /s/ Alexandra Caggiano	By: /s/ Steven W. Rich
4	Alexandra Caggiano Weinstein Caggiano PLLC	Steven W. Rich Shook, Hardy & Bacon L.L.P.
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6		
7		
8		E-mail: srich@shb.com
9	Attorneys for Plaintiff	Attorney for Defendants Sanofi- Aventis U.S. LLC and Sanofi US
10		Services Inc.
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12		
13		
14		
15	<b>CERTIFICATE OF SERVICE</b>	
16	I hereby certify that on January 3, 2024, I electronically filed the foregoing documen	
17	with the Clerk of the Court using the CM/ECF system, which will send notification of such	
18		
19	filing to those attorneys of record registered on the CM/ECF system. All other parties, if any,	
20	shall be served in accordance with the Federal Rules of Civil Procedure.	
21		
22		<u>/s/ Steven W. Rich</u> Steven W. Rich
23		Steven W. Kich
24		
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		Shook, Hardy& Bacon L.L.P.

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Honorable James L. Robart 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 LISA BROWNE, et al., 9 Case No. 2:23-cv-01643-JLR Plaintiffs. 10 [PROPOSED] ORDER GRANTING 11 v. STAY OF PROCEEDINGS SANOFI-AVENTIS U.S. LLC and SANOFI 12 US SERVICES INC. formerly known as 13 SANOFI-AVENTIS U.S. INC., 14 Defendants. 15 16 17 ORDER GRANTING STAY OF PROCEEDINGS 18 The parties have advised the Court (Dkt. #19) that they have reached an agreement 19 in principle for the complete resolution of this matter. They have further advised that they are 20 in the process of preparing and finalizing a Master Settlement Agreement which will include 21 the instant case. 22 The parties have asked the Court to vacate all pending deadlines and stay this case for 23 six months, through and including May 24, 2024. 24 25 The Court therefore ORDERS that this case and all pending deadlines are stayed until 26 May 24, 2024. At that time, the parties shall file a status report informing the Court of the settlement status of this case, or shall file a motion for appropriate relief. Shook, Hardy& Bacon L.L.P. ORDER GRANTING STAY OF PROCEEDINGS 701 5th Avenue, Suite 6800

Seattle, WA 98104-7066

206.344.7600

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Presented by: /s/ Steven W. Rich Dated this 3rd day of January 2024. m R. Plut UNITED'STATES DISTRICT JUDGE 

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